

Exhibit D



MotleyRice

Robert T. Haeefe
Licensed in NJ & PA
DIRECT DIAL 843.216.9184
DIRECT FAX 843.216.9450
RHaeefe@motleyrice.com

April 21, 2006

Rayner M. Hamilton
White & Case LLP
1155 Avenue Of The Americas
New York, New York 10036

152 Sheepshank Court,
Box 808
Boca Grande, Florida 33921

Re: In re Terrorist Attacks on September 11, 2001, MDL No. 1570 (RCC)
This Document relates to: Burnett et al. v. Al Baraka Inv. & Dev., et al, Case No. 03-CV-9849

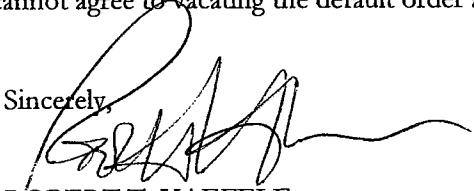
Dear Mr. Raynor:

I have received your letter and e-mails of April 17, 2006 and your follow up electronic mail from today regarding your client Ahmed Zaki Yamani. In your April 17, 2006 communications you indicate that defendant Yamani ought not to have been placed in default, premised on your communication to the various other attorneys in February 2005, which requested that your client be dismissed or, in the alternative, plaintiffs file a Rule 12(e) more definite statement, pursuant to Case Management Order 2.

Please note that in accordance with CMO #2, as modified by a July 27, 2005 endorsement extending the deadline to September 30, 2005, plaintiffs filed a Rule 12(e) more definite statement as to defendant Yamani on September 30, 2005. As you noted in your correspondence, defendant Yamani's obligation to file a responsive pleading began to run at least as of September 30, 2005, when the Rule 12(e) filing occurred. Accordingly, defendant Yamani was in default at least as of 30 days after the Rule 12(e) more definite statement was filed.

Under the circumstances, I am afraid we cannot agree to vacating the default order and/or dismissing your client as you have suggested.

Sincerely,


ROBERT T. HAEFELE

cc: Sean P. Carter, Esq., Cozen O'Connor
Andrea Bierstein, Esq., Hanley Conroy Bierstein & Sheridan
James P. Kreindler, Esq., Kreindler & Kreindler LLP
Michael K. Kellogg, Esq.
Christopher Curran, Esq.

www.motleyrice.com

Motley Rice LLC
Attorneys at Law



MT. PLEASANT

28 BRIDGESIDE BLVD.
P.O. BOX 1792
MT. PLEASANT, SC 29465
843-216-9000
843-216-9450 FAX

BARNWELL

1750 JACKSON ST.
P.O. BOX 365
BARNWELL, SC 29812
803-224-8800
803-259-7048 FAX

PROVIDENCE

321 SOUTH MAIN ST.
P.O. BOX 6067
PROVIDENCE, RI 02940
401-457-7700
401-457-7708 FAX

HARTFORD

ONE CORPORATE CENTER
20 CHURCH ST., 17TH FLOOR
HARTFORD, CT 06103
860-882-1681
860-882-1682 FAX

ATLANTA

600 WEST PEACHTREE ST.
SUITE 800
ATLANTA, GEORGIA 30308
404-201-6900
404-201-6959 FAX